

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. CR 19-1820 MV

CHRISTOPHER DELGADO,

Defendant.

UNOPPOSED SEALED MOTION TO AMEND CONDITIONS OF RELEASE

Defendant Christopher Delgado (Mr. Delgado), by and through counsel, hereby moves this Court to modify the conditions of release previously set in this case. Specifically, Defendant states as follows:

1. Mr. Delgado was indicted on 27 June 2019, in a two-count indictment, for making false statements on a credit application.
2. Mr. Delgado was arrested on 11 July 2019 and released the next day pursuant to a Sealed Stipulated Motion and Order Regarding Conditions of Release, Doc. 11.
3. After his plea in this case, the Court entered a standard Order Setting Conditions of Release, Doc. 33. This Order, in ¶ 7(f), does not expressly address travel privileges or restrictions outside of Bernalillo County. Mr. Delgado is self-employed and is engaged in providing cooling, refrigerated air, and basic plumbing services. He has business opportunities to provide these services both within and outside of Bernalillo County. As such, he seeks to modify his travel restrictions to expressly allow him to travel within the State of New Mexico.

4. Pursuant to the government's request, Mr. Delgado will not stay remain overnight outside of Bernalillo County during any of his business engagements and will notify Pretrial Services upon completion of a business engagement outside of Bernalillo County.

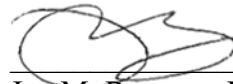
5. Mr. Delgado is a lifelong resident of New Mexico and does not pose a flight risk. He has no prior felony history and does not pose a danger to the community.

6. Opposing counsel AUSA Paul Schied does not oppose this motion.

7. U.S. Pretrial Officer Krystle Avrit does not oppose this motion.

Wherefore, based on the foregoing, Defendant Christopher Delgado respectfully requests that his conditions of release be modified to allow Mr. Delgado to travel within the State of New Mexico. All other conditions of release, previously imposed in this case and as applicable, will remain in effect.

Respectfully Submitted,



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Certificate of Service

I hereby certify that, on May 18, 2020, the foregoing pleading was filed electronically pursuant to CM/ECF procedures for the District of New Mexico, which caused the parties and/or their counsel to be served by electronic transmission, as more fully reflected by the Notice of Electronic Filing.

/s/ Joe M. Romero, Jr.
Joe M. Romero, Jr.